

**APPENDIX D. RESPONSES TO POTRERO
HILLS LANDFILL COMMENTS**

Appendix D2. Vegetation Resources and Grazing Management

**Appendix D2a. Response to Landfill Comments
on the Vegetation Resources and Grazing Management Section
of the Draft Report of the Scientific Review of Biological
Resources Impacts and Proposed Mitigation for the
Potrero Hills Landfill Phase II Expansion**

Date: April 12, 2007

To: Jennifer Feinberg, BCDC
Dan Airola

From: Pam Muick, Ph.D.
Scientific Review Panel: Vegetation & Grazing Management

RE: Response to Landfill Comments on the Vegetation Resources Section of the Scientific Review of Biological Resources Impacts and Proposed Mitigation for the Potrero Hills Landfill Phase II Expansion

Attached are my responses to the Landfill's comments on Chapter 3, "Vegetation Resources and Grazing Management," of the scientific review for the Potrero Hills Landfill Phase II expansion. As directed, I have provided responses clarifying the rationale for my review comments and my response to Landfill comments VR1, VR3–VR8, and VR10–VR12. (Refer to Appendix D2b for responses to Landfill comments VR2 and VR9.)

TABLE 1. Responses to Landfill Comments on Vegetation Resources

Comment Number	Summary of Comment/ Requested Change	Response
VR 1	Asserts that the characterization of habitat loss from the landfill is not permanent but temporary because the site will be revegetated following closure	The limited information provided on revegetation of completed landfill cells, as well as evidence of substantial areas of bare ground on the Phase 1 landfill does not warrant a conclusion at this time that revegetation will be successfully accomplished. More information should be provided to support the assertion that the landfill cells will be successfully revegetated to habitat of similar value and character after filling. (See also, Response to Comment VR3 below).
VR 2	Disagrees with characterization of project impacts to Spring Branch Creek headwaters. Suggests that the commentor did not read a relevant report by Mitch Swanson.	Mr. Swanson's report was not provided for review until April 2007, after the draft report was prepared. Responses to comments VR2 and VR9 are provided in Appendix D2b.
VR 3	Habitat fragmentation – disagrees with the characterization that 100s of acres of the landfill will be bare land at any one time	Using aerial photography on Google Earth (www.earth.google.com) to look at the Phase I landfill, I estimated a minimum of 160 acres of bare soil within the existing Phase I landfill. Considering the engineering "cell" program outlined for Phase II, the observed pattern of bare land is likely to continue. Therefore I do not see a reason to change this comment. I've attached a copy of my Google Earth measurement to verify the estimate. (See Figure D2a-1.)

Comment Number	Summary of Comment/ Requested Change	Response
VR 4	Cumulative Effects – potential expansion of the landfill to the property to the east. “Any expansion beyond the proposed project is pure speculation and conjecture by the author.”	<p>Another way to approach this issue is to ask the question “If the adjacent properties owned by the Landfill were going to be appraised would the potential for landfill expansion be included or excluded?”</p> <p>PHLF currently owns the contiguous properties due east of Phase II expansion (APNs 0046 120 210, 160 acres, and 0046 120 220, 137.39 acres). These properties are mapped as the “Eastern Valley” on various maps in the Phase II documents. Because the two parcels currently do not have and are not proposed to have deed restrictions prohibiting their use for landfill expansion (based on my research at the County Assessor’s office) it is reasonable to assume that the rights to use these parcels for landfill or other compatible commercial or industrial uses continues to exist. Whether PHLF or another entity intends to exercise these rights is a separate question. The development rights exist on the “Eastern Valley” based on current title and zoning law. If PHLF wishes to moot this concern about landfill expansion it would sever these rights from the parcels now known as the Eastern Valley.</p>
VR 5	Questions the statement that “Unpermitted concrete rubble is stored on-site”	This quote is taken from California Division of Mines website on the quarries located within the PHLF.
VR 6	Off-site mitigation bullet is not accurate. Else Gridley is a contingency site	Its identification as a contingency site suggests some possibility for its use. The statement that such mitigation would result in a net loss to the secondary zone is factually true. Given the apparent low likelihood of use of this site, the characterization has been deleted from the report.
VR 7	Power Station Location – Characterizes as outside the reviewers expertise the statement that the Power plant location within the Griffith Ranch is inappropriate because it introduces industrial development into a watershed with few development impacts, while existing disturbed area Phases I and II footprints could be used.	This objection is moot, as the landfill has agreed to site the power plant within the Phase I footprint.
VR 8	Habitat fragmentation and habitat loss – section is weak and unsupported.	I consider most of the impacts described in this section as obvious and not requiring a high level of support. I deleted the second half of this paragraph starting with the sentence that begins “Examples of species . . .” to the end of this paragraph.
VR 9	Chinook salmon do not use Spring Branch Creek within the project site, based on the low flow levels and blockage of migration by 3 dams. Provide data for Chinook salmon runs	The characterization of Spring Branch Creek “as habitat for winter-run chinook salmon” was intended to indicate that the lower watershed receives salmon use. Changes in the upper watershed could therefore affect downstream habitat conditions for chinook salmon. See Appendix D2b for citations.

Comment Number	Summary of Comment/ Requested Change	Response
VR 10	Comments on Mitigation Measure 4.2-3 regarding the need for mitigation for habitat for the valley elderberry longhorn beetle are conjecture and should be eliminated	The concern has been alleviated by clarification of the size and location of the 179-acre footprint and boundary for Phase II. The comment has been deleted.
VR 11	Regarding “Evaluation and Comments for 4.7.2 Wildlife Habitat and 5.3 Hydrologic Monitoring on Griffith Ranch”. no trial artificial swales have been constructed at the Griffith Ranch. The Landfill’s technical team has conducted soil and vegetative analysis of the area. Based on this information and experience elsewhere, the site is suitable for restoration of seasonal wetlands. The Landfill recommends deletion of the comment.	This comment will be reworded as follows. “During field surveys, I observed bulldozer scrapes about 1 foot deep in the northeast corner of the Griffith Ranch that date from 2005–06, based on living and dead vegetation. According to the Landfill consultants these are not related to any investigations they initiated. However, these scrapes, which are located near the area where wetland mitigation construction is planned, were not holding water nor growing wetland plants, despite the high rainfall year.” Recommendation: Successful wetland mitigation on the northern Griffith Ranch could be problematic
VR 12	Woody debris should not be removed, as it provides habitat for the California tiger salamander	I believe that the wood debris onsite should be removed unless it is serving as important tiger salamander habitat. Because there is a California tiger salamander expert team on the panel, I will defer to his recommendation.

**Figure D2a-1. Air Photo Used to Estimate
of Bare Soil, Phase I Landfill**

